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July 28, 2005

VIA EMAIL AND OVERNIGHT DELIVERY

Mary Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station
Boston, Massachusetts 02110

Re: D.T.E. 04-33: Petition of Verizon New England Inc. for Amendment to Interconnection Agreements with Competitive Local Exchange Carriers and Commercial Mobile Radio Service Providers in Massachusetts, Pursuant to Section 252 of the Communications Act of 1934, as Amended, and the *Triennial Review Order*

Dear Ms. Cottrell:

The Competitive Carrier Coalition, the Competitive Carrier Group and AT&T Communications of New England, Inc. hereby submit this Assented-To Motion for Extension of Time to file motions for reconsideration of the Department's July 14, 2005 Arbitration Order in the above-captioned proceeding. Enclosed for filing please find an original and seven (7) copies of this Motion, a duplicate and a self-addressed, postage-paid envelope. Please date-stamp the duplicate upon receipt and return it in the envelope provided. Please feel free to contact me at (202) 887-1211 if you have any questions or require further information.

Respectfully submitted,

Brett H. Freedson

Brett Heather Freedson

cc: Service List, D.T.E. 04-33

**Before the
MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition of Verizon New England Inc. for)
Arbitration of an Amendment to Interconnection)
Agreements with Competitive Local Exchange) D.T.E. 04-33
Carriers and Commercial Mobile Radio Service)
Providers in Massachusetts Pursuant to Section)
252 of the Communications Act of 1934, as)
Amended, and the *Triennial Review Order*)

ASSENTED-TO MOTION FOR EXTENSION OF TIME

The Competitive Carrier Coalition,¹ the Competitive Carrier Group² and AT&T Communications of New England, Inc. (the “Parties”), hereby respectfully request that the Massachusetts Department of Telecommunications and Energy (the “Department”) grant an extension of time, until August 24, 2005, to file motions for reconsideration of the Arbitration Order issued by the Department in the above-captioned proceeding.³ Verizon New England Inc. assents to relief requested by this Motion.

Because the rulings of the Department in the 293-page Arbitration Order address a broad range of complex legal issues that substantially impact the telecommunications operations of competitive local exchange carriers (“CLECs”) within Massachusetts, including

¹ The Competitive Carrier Coalition includes: CTC Communications Corp.; DSLNet Communications, LLC; Focal Communications Corporation of Massachusetts, Lightship Telecom, LLC; RCN-BecoCom LLC; and RCN Telecom Services of Massachusetts, Inc.


² The Competitive Carrier Group includes: A.R.C. Networks Inc. d/b/a InfoHighway Communications Corporation; Broadview Networks Inc. and Broadview NP Acquisition Corp.; Cleartel Telecommunications, Inc. f/k/a Essex Acquisition Corp.; DIECA Communications Inc. d/b/a Covad Communications Company; DSCI Corp., IDT America Corp.; KMC Telecom V, Inc.; and XO Communications Services, Inc. (formerly XO Massachusetts, Inc. and Allegiance Telecom of Massachusetts, Inc.).

³ Arbitration Order in D.T.E. 04-33 (rel. Jul. 14, 2005).

the Parties, good cause exists for granting this extension.⁴ Accordingly, the current August 3, 2005 deadline for filing motions for reconsideration of the Arbitration Order, pursuant to 220 C.M.R. § 1.11(10), does not permit the Parties adequate time to review and analyze the determinations of the Department, and to effectively coordinate a response to the Department. Because the Department already has determined that the Amendment to individual interconnection agreements between Verizon and Massachusetts CLECs will be effective on the issue date of the Arbitration Order, July 14, 2005, no party will be prejudiced by a grant of this Motion by the Department.⁵

WHEREFORE, the Parties respectfully request that the Department grant this Assented-To Motion for Extension of Time, as good cause exists for doing so.

Respectfully submitted,

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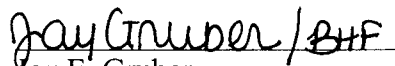
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⁴ See 220 C.M.R. § 1.02(5) (For good cause shown, the Department has discretion to extend time limits prescribed or allowed by its Procedural Rules.).

⁵ Arbitration Order at 188-189.

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Dated: July 28, 2005